

Application No.: 09/546,981

Docket No.: 20421-00061

REMARKS

Claims 1-16 are pending in the application. The specification and claims 1, 7 and 11 have been amended by the present amendment.

In the September 22, 2003 Office Action, an amendment to the specification was objected to and claims 1-16 were rejected under 35 U.S.C. §103(a) as being unpatentable over Nagami et al (U.S. Patent No. 6,343,322).

In response to the objection to the specification that indicated the "noted passage does not support the specification as amended," the amended language has been removed from the specification. Therefore, the amendment of the specification raises no question of new matter.

Rejections under 35 U.S.C. §103

Claims 1-16 were rejected under 35 U.S.C. §102(e) as being anticipated by Nagami et al. Applicants respectfully traverse.

Claims 1, 7 and 11 have been amended to clarify the invention. In particular, claims 1 and 11 have been amended to recite:

performing logical bridging of data frames destined for or originating from said control point in a network processor directly connected to said control point, said network processor further comprising an L2 table and a media access control (MAC) address database.

Claim 7 has been amended with similar language. Support for the amendments is provided at least at page 5, line 22 to page 6, line 7; and shown at least in Fig. 2 at references 205, 213 and 214. Therefore, the amendment raises no question of new matter.

Nagami et al discloses a packet transfer scheme for transferring packets at a boundary of a plurality of networks.¹ In particular, Nagami et al discloses a network layer control unit 207 connected to a network layer switch unit 204; the network layer switch unit 204 connected to a datalink layer-network layer translation unit 203; and the datalink layer-network layer translation unit 203 connected to a datalink layer switch unit 202.²

¹ Nagami et al at Abstract.

² Id. at Fig. 4, column 8, lines 54-67.

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In addition, Nagami et al discloses the datalink layer switch unit 202 is provided with a datalink layer routing table (i.e., an L2 routing table) therein, that is managed by a datalink layer control unit 206.³ Further, Nagami et al discloses the network layer control unit 207 has a function for managing the L3 routing table provided in the network layer switch unit 204.⁴ Thus, Nagami et al discloses *a plurality of units* are used to perform logical bridging functions. These plurality of units, as discussed above, include the network layer switch unit 204, the datalink layer-network layer translation unit 203, and the datalink layer switch unit 202.⁵

Moreover, the Office Action of September 22, 2003, suggests the network layer control unit 207 of Nagami et al is analogous to the "control point" of the claimed invention.⁶

However, Nagami et al nowhere discloses, as recited in amended claims 1 and 11:

performing logical bridging of data frames destined for or originating from said control point in a network processor directly connected to said control point, said network processor further comprising an L2 table and a media access control (MAC) address database (emphasis added).

In addition, amended independent claim 7 recites:

wherein a network processor directly connected to said control point performs logical bridging functions needed by said control point, said network processor further comprising an L2 table and a media access control (MAC) address database (emphasis added).

That is, in contrast to the claimed invention, Fig. 4 of Nagami et al clearly shows that *only* the network layer switch unit 204 is *directly connected* to the network layer control unit 207, which has been suggested in the Office Action of September 22, 2003, to be analogous to the "control point" of the claimed invention.

Further, the network layer switch unit 204 of Nagami et al does *not* perform the recited "logical bridging" function of the network processor 205, as recited in the claimed invention,

Furthermore, the network layer switch unit 204 of Nagami et al does *not* contain both "L2 table and a media access control (MAC) address database," in the network processor 205 of the as recited in the claimed invention and as shown in Fig. 2 of the specification (i.e., see L2 table 213 and MAC address database 214).

³ *Id.* at Fig. 4, column 9, lines 16-23.

⁴ *Id.* at Fig. 4, ref. 207; column 9, lines 65-66.

⁵ *Id.* at Fig. 4, refs. 202-206; column 9, line 1 to column 10, line 7.

⁶ Outstanding Office Action mailed September 22, 2003, at page 1, paragraph 4, lines 3-6.

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Furthermore, claim 9, which is dependent on claim 7, recites:

“said logical bridging function in said network processor directly connected to said control point learns a source address in said frame in a MAC address database (emphasis added).”

Claims 5 and 13, which are dependent on claims 1 and 11, respectively, also recite the “MAC address database” limitation. The “MAC address database” recited in this apparatus claim is clearly an element of the recited “network processor” as shown in Figure 2 of the specification where the network processor 205 contains the L2 table 213 that further contains the MAC address database 214. The network processor 205 is also “directly connected to said control point” as recited in claims 1, 7 and 11, as discussed above.

Furthermore, in contrast to the claimed invention, Nagami et al.: (1) discloses *only* one unit, the data link layer switch unit 202 that contains an L2 table; (2) nowhere discloses the recited “MAC address database” in association with the L2 table or the data link layer switch unit 202; and (3) discloses the data link layer switch unit 202 containing the L2 table is *not directly connected* to the network layer control unit 207, which has been suggested in the Office Action of September 22, 2003, to be analogous to the “control point” of the claimed invention.⁷

Moreover, Nagami et al. discloses the network layer control unit 207 manages an L3 routing table using existing routing protocols such as Opens Shortest Path First (OSPF).⁸ In contrast to Nagami et al., a goal of the claimed invention is to off-load processing tasks such as OSPF from the control point 206.⁹ Therefore, Nagami et al. teaches away from the claimed invention.

Therefore, it is respectfully submitted that Nagami et al. nowhere discloses, suggests or makes obvious the limitations of claims 1, 5, 7, 9, 11 and 13; and that claims 1, 5, 7, 9, 11, and 13, and claims dependent thereon, patentably distinguish thereover.

⁷ See. Nagami et al. at Fig. 4, ref. 202, column 9, lines 16-23.

⁸ *Id.* at Fig. 4, ref. 207; column 9, line 65 to column 10, line 7.

⁹ Specification at page 3, lines 5-12, and page 4, line 11 to page 5, line 1.

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Conclusions

In view of the above, reconsideration and allowance are, therefore, respectfully solicited.

In the event the Examiner believes an interview might serve to advance the prosecution of this application in any way, the undersigned attorney is available at the telephone number noted below.

Applicant believes no fees are due with this request. However, the Director is hereby authorized to charge any fees, or credit any overpayment, associated with this communication, including any extension fees, to Deposit Account No. 50-0563.

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Respectfully submitted,

Myron Wyche

Myron Wyche, Reg. No. 47,341
Customer Number 30678
CONNOLLY BOVE LODGE & HUTZ LLP
1990 M Street, N.W., Suite 800
Washington, D.C. 20036-3425
Telephone: 202-331-7111